

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

RIDGE CLEARING & OUTSOURCING  
SOLUTIONS, INC.

Plaintiff,

- against -

ADNAN KHASHOGGI,

Defendant.

:  
: 07 Civ. 6611 (RJH)(HP)

: ECF CASE

: SCHEDULING ORDER

Pursuant to Fed. R. Civ. Proc. 26(f) and the Court's Initial Scheduling Order, the parties to  
the above-referenced action jointly propose the following scheduling order:

A. Description of Case:

i. Identify the attorneys of record for each party including lead trial counsel:

For Plaintiff: Levi Lubarsky & Feigenbaum LLP  
1185 Avenue of the Americas, 17<sup>th</sup> Floor  
New York, New York 10036  
(212) 308-8830

Lead Trial Counsel: Howard B. Levi, Esq.

For Defendant: Hinshaw & Culbertson, LLP  
780 Third Avenue, 4<sup>th</sup> Floor  
New York, New York 10017  
(212) 471-6200

Lead Trial Counsel: Maranda E. Fritz, Esq.

ii. Basis for federal jurisdiction: diversity jurisdiction pursuant to 28 U.S.C. § 1332.

- iii. Claim: Plaintiff asserts a breach of contract claim to recover monies owed to plaintiff pursuant to an alleged breach of a margin agreement that Ultimate Holdings, Ltd. entered into with plaintiff in August 2001.
- iv. Major legal and factual issues: whether the corporate veil of Ultimate Holdings, Ltd. ("Ultimate") should be pierced; the relationship between defendant and Ultimate; and whether defendant is liable for the alleged breach of a margin agreement with plaintiff.
- v. Relief sought: Damages in excess of \$20 million.

B. Proposed Case Management Plan

- i. Identify all pending motions: None
- ii. Cutoff date for joinder of additional parties: N/A
- iii. Cutoff date for amendment of pleadings: June 2, 2008
- iv. Schedule for completion of discovery:
  - a. Rule 26(a)(1) disclosures due by April 1, 2008
  - b. Fact discovery completion date: September 15, 2008
  - c. Rule 26(a)(2) disclosures due by September 15, 2008
  - d. Expert Reports Due: October 15, 2009
  - e. Expert Discovery Completion Date: November 14, 2008
- v. Dispositive motions due on or before January 8, 2009
- vi. Due date for filing pretrial order: December 15, 2008
- vii. Trial schedule:
  - a. A jury trial has not currently been requested
  - b. Trial-ready on or about February 17, 2009
  - c. 3-day trial.

C. Consent to Proceed Before a Magistrate Judge: The parties do not unanimously consent to proceed before a Magistrate Judge.

D. Status of Settlement Discussions: No settlement discussions have taken place, and the

parties are not requesting a settlement conference at this time.

Dated: New York, New York  
February 15, 2008

LEVI LUBARSKY & FEIGENBAUM LLP

By: 

Gail R. Zweig

1185 Avenue of the Americas, 17th Floor  
New York, New York 10036  
(212) 398-6100

Attorneys for Plaintiff Ridge Clearing  
& Outsourcing Solutions, Inc.

HINSHAW & CULBERTSON LLP


By: \_\_\_\_\_

Maranda E. Fritz

780 Third Avenue, 4th Floor  
New York, New York 10017  
(212) 471-6200

Attorneys for Defendant Adnan Khashoggi

SO ORDERED:

\_\_\_\_\_  
Hon. Richard J. Holwell, U.S.D.J. 

parties are not requesting a settlement conference at this time.

Dated: New York, New York

February 15, 2008

*E. a. status conference shall be held on 2/19/08 at 10:30 a.m. no extension of discovery schedule absent extenuating circumstances.*

LEVI LUBARSKY & FEIGENBAUM LLP

HINSHAW & CULBERTSON LLP

By: \_\_\_\_\_

Gail R. Zweig

1185 Avenue of the Americas, 17th Floor

New York, New York 10036

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Attorneys for Plaintiff Ridge Clearing  
& Outsourcing Solutions, Inc.

By: \_\_\_\_\_

Maranda E. Fritz

780 Third Avenue, 4th Floor

New York, New York 10017

(212) 471-6200

Attorneys for Defendant Adnan Khashoggi

SO ORDERED:

*[Signature]*

Hon. Richard J. Holwell, U.S.D.J.